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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20054

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of 73.202(b) ) MM Docket No. 01-\_\_  
Table of Allotments )  
FM Broadcast Stations )  
(Llano and Lorena, TX) )

To: Chief, Allocations Branch  
Mass Media Bureau

**Petition for Rulemaking**

Pursuant to 47 CFR 1.420(g), Elgin FM Limited Partnership ("Elgin"), permittee of station KEXX (FM), Llano, TX, respectfully petitions the FCC to institute a Rule Making proceeding that proposes to amend the FM Table of Allotments by (i) substituting channel 294A for channel 293A at Llano, TX, (ii) deleting channel 294A at Llano and allocating it to Lorena, TX as a first local aural service and (iii) allocating channel 271A as a replacement for channel 293A at Llano, TX. <sup>1/</sup>

**DISCUSSION**

The proposed allocation would serve the public interest by providing a first local aural service to the community of Lorena, TX. <sup>2/</sup> Lorena is an incorporated city in McLennan County Texas, whose 1998 population was 1,650 persons, an increase of more than

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<sup>1/</sup> A "Request for Dismissal" is being filed this date at the FCC with respect to a Petition for Rule Making, filed by Bordeaux Radio Broadcasting to allocate channel 2954 at Hewitt, TX.

<sup>2/</sup> See Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990).

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40% over its 1990 Census population of 1,158. <sup>3/</sup> It has a Mayor (Stacy Garvin), a City Manager (Robert Owens) and a City Hall. Lorena has its own school system, its own police and fire departments, and its own post office.

Like other "communities" to which the FCC has allotted a local FM service, Lorena has numerous local churches, <sup>4/</sup> Providence Medical Clinic, civic groups such as AARP and the Texas Greyhound Association, a local newspaper, approximately 218 commercial business establishments (as of March 1999), a local bank and a Chamber of Commerce.

Attached hereto is an engineering report, which both details how Petitioner's proposal is consistent with the FCC's rules and also confirms the availability of ch. 294A at Lorena. See Appendix A. Petitioner's proposal would result in a preferential arrangement of FM allotments. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992). The engineering report also confirms the availability of channel 271A at Llano as a replacement channel for the deleted allocation. See Appendix A.

Finally, should this Petition be granted, and should the Petitioner be granted a CP for this new station at Lorena, Petitioner will promptly file an application with the FCC to con-

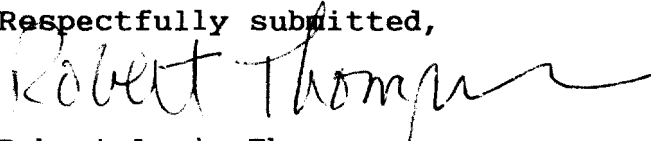
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<sup>3/</sup> Texas State Data Center (January 1, 1998 estimate).

<sup>4/</sup> Lorena United Methodist Church, First Baptist Church, Downsville Baptist Church, Mt. Olive Baptist Church, Cottonwood Baptist Church, Crossroads Baptist Church and Bethany Baptist Church (all with Lorena mailing addresses).

struct its new facility and, once granted, will build the new facility at Lorena, TX.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert Thompson", with a long horizontal flourish extending to the right.

Robert Lewis Thompson  
**THIEMANN AITKEN & VOHRA, LLC**  
908 King Street, Suite 300  
Alexandria, VA 22314  
(703) 836-9400  
**rlt4fcc@erols.com**

Counsel for Elgin FM Limited Partnership

January 26, 2001

**ENGINEERING STATEMENT  
IN SUPPORT OF  
PETITION FOR RULE MAKING**

**January 25, 2001**

**Elgin FM Limited Partnership  
Radio Station KEXX(FM)  
FCC File No. BPH-19970814MI  
FM Channel 293A □ 106.5 MHz □ Llano, Texas  
FM Channel 294A □ 106.7 MHz □ Lorena, Texas  
FM Channel 271A □ 102.1 MHz □ Llano, Texas**



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(323) 467-5010 / FAX (323) 467-5848

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- E-11     Map Showing Channel 271A Permissible Area to Locate and  
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## **EXHIBIT E-1**

### **ENGINEERING STATEMENT**

The information and data contained within these engineering exhibits were prepared on behalf of Elgin FM Limited Partnership ("Elgin"), permittee of station KEXX(FM), Channel 293A, Llano, Texas, FCC File No. BPH-19970814MI, in support of a *Petition for Rule Making*. It is proposed to change the KEXX(FM) facility from Channel 293A at Llano to Channel 294A at Lorena, Texas.

#### **I. PROPOSED ALLOTMENTS**

Elgin proposes to move KEXX(FM) from Channel 293A at Llano to Channel 294A at Lorena, Texas. Elgin also proposes to replace Channel 293A at Llano with Channel 271A. The proposed allotment reference site for Channel 294A at Lorena is the center of town, the geographic coordinates of which are:

31° 22' 56" North Latitude  
97° 12' 46" West Longitude

At these coordinates the Channel 294A proposed allotment at Lorena is fully-spaced to all existing, authorized and proposed stations and allotments in the latest CDBS database.

It is also proposed to replace Channel 293A at Llano with Channel 271A. There is a site restriction on Channel 271A at Llano of 9.9 kilometers west, south-west, because of stations KACQ(FM) on Channel 270A at Lometa, and KPEZ(FM) on Channel 272C2 at Austin, Texas. The proposed allotment reference site for Channel 271A at Llano is:

30° 43' 13" North Latitude  
98° 46' 14" West Longitude

From these coordinates the proposed Channel 271A allotment at Llano is fully-spaced to all other stations and will provide city grade service to the entire principal community of Llano. Exhibit E-11 shows in green the fully-spaced permissible area to locate Channel 271A and the proposed allotment reference site in relationship to the community of Llano. Exhibit E-10 demonstrates that the facility will provide city grade service to the entire community limits in accordance with Section 73.315.

If the allotment of Channel 271A to Llano is made, Elgin FM Limited Partnership intends to apply for that facility.

## **II. METHODS**

For each FM station presented in these exhibits, terrain elevation data from three to sixteen kilometers on radials spaced at one-degree azimuthal intervals, starting with True North, were extracted from topographic data obtained from the computerized Defense Mapping Agency three arc-second point elevation database. Along each radial 261 points were linearly interpolated according to the requirements of § 73.312(d). The height above average terrain along each of the 360 radials was computed by averaging the elevations between three and sixteen kilometers below the antenna radiation center in accordance with § 73.313(d)(3).

The locations of the 60 dBμ F(50,50) service contours were determined using computer methods outlined in F.C.C. publication PB-249144, *Field Strength Calculations for TV and FM Broadcasting*. These computer methods use digitized data taken from the graph of § 73.333 Figure 1. Intermediate values are obtained using bivariate interpolation techniques for surface fitting.

For non-Class C FM stations operating at less than maximum facilities, technical parameters were based on maximum facilities for the class of station under study. In the case of Class C stations, either the actual operating parameters or a minimum 300-meter height above average terrain and 100-kW effective radiated power was assumed, whichever is greater.

Technical data for AM broadcast stations were obtained from the latest version of the FCC AM Engineering Database. Soil conductivities used in the determination of distances to the nighttime interference-free contours were derived from the computerized FCC M-3 soil conductivity database. Conductivity data were extracted for every one degree of azimuth.

For stations employing directional antenna systems, the Standard Radiation using the theoretical operating parameters contained within the AM Engineering Database was computed and used for inverse field strength. In the case of nondirectional stations, the effective field strengths at one kilometer were employed. In accordance with § 73.183(e), the "equivalent-distance" (Kirke) method was used to determine the distances to the nighttime interference-free contours where more than one conductivity zone exists over the path length.

Pursuant to established Commission policy, fulltime AM reception service is defined by the station's nighttime interference-free contour for non-Class A stations,

and by the 0.5 mV/m groundwave contour for Class A stations. Nighttime interference studies were performed for all fulltime AM facilities within the study areas to determine those AM stations that provide nighttime interference-free service.

Population figures for the areas within the contours were obtained through use of the computerized *1990 Census of Population and Housing Public Law 94-171 Data* made available by the U.S. Department of Commerce, Bureau of the Census. The census counts were taken down to the block level for maximum accuracy and resolution. When the centroid coordinates of a census block fell within the contour the entire population associated with the block was assumed to reside within the contour. When the centroid fell outside the contour no portion of the population was counted.

The areas within the contours were computed using numerical integration employing the computed distances to the contours for each degree of azimuth. Distances to contours along intermediate azimuths were obtained mathematically by piecewise third-order polynomial approximations.

In cases where a station had a licensed and authorized facility, the contours were based on the authorized facility.

### **III. LOSS AREA**

A study was conducted to determine the number of AM and FM stations that provide fulltime aural broadcast service to the area contained within the KEXX(FM) 60 dB $\mu$  service contour at Llano. Exhibits E-2 and E-3 show in red shading the loss area created by the proposed move of KEXX(FM) from Llano to Lorena.

Also studied were the service contours of all AM and FM stations in the area to determine those that provide fulltime service to all or part of the loss area within the KEXX(FM) contour at Llano. Exhibit E-5 is a tabulation of the stations that provide fulltime aural broadcast reception within the proposed service contour of KEXX(FM) at Llano.

Exhibit E-3 shows the KEXX(FM) service contour from Llano and the service contours of the AM and FM stations that provide fulltime aural service within the proposed loss area. Exhibit E-4 tabulates the land areas and populations within identified regions subject to loss by ascending number of fulltime aural broadcast services that serve each area.

The results of this study indicate that the proposed change in principal community will not create any white or gray areas. In fact, *every person residing*



*within the proposed loss area will continue to receive at least three fulltime aural reception services, and a total of 200 persons will be underserved, 94 of which are already underserved with the presence of KEXX(FM) at Llano.*

#### **IV. GAIN AREA**

The same type of study was performed to determine the number of existing fulltime aural broadcast reception services within the KEXX(FM) proposed gain area at Lorena. Exhibit E-8 tabulates a list of contributing stations to the gain area. Exhibit E-7 shows the areas and populations served by existing stations within the proposed gain area.

Exhibits E-2 and E-6 show in green shading the proposed KEXX(FM) gain area created by adoption of the proposed principal community change to Lorena.

A further study was conducted to analyze the proposed Channel 294A facility at Lorena to determine its relationship to the Urbanized Area of Waco, which is nearby. Exhibit E-9 shows in yellow the Census Urbanized Area of Waco and the KEXX(FM) 70 dBμ city grade contour from the proposed allotment reference site, which is at the center of Lorena. The proposed 70 dBμ contour will encompass only 29.0 percent of the entire Urbanized Area.

#### **V. CONCLUSIONS**

In conclusion, the following salient facts result from the outcome of the aforementioned analysis.

- Establishment of Channel 294A at Lorena will provide the community with its first local fulltime aural broadcast service.
- Channel 271A is available for use at Llano as a replacement to Channel 293A and is herein proposed.
- Channel 297A is available for use at Llano for yet additional expressions of interest to serve that community.
- No other commercial FM channel is available for allotment at Lorena as an alternative to Channel 294A.
- The proposed loss area will be left with no fewer than three fulltime aural reception services.

- The proposed loss area will contain an underserved population of 200 persons, 94 of which are already underserved with KEXX(FM) authorized to the community.
- Llano will be left with three commercial aural broadcast services and one vacant noncommercial allotment upon removal of Channel 293A and replacement by Channel 271A.

The results of this study demonstrate that the FM Table of Allotments in § 73.202(b) of the Commission's Rules may be amended in technical compliance with all applicable spacing rules. Therefore, the Petitioner, Elgin FM Limited Partnership, respectfully requests the following changes to the Table:

<b><u>PRESENT</u></b>	
<b><u>CITY</u></b>	<b><u>CHANNEL</u></b>
Llano, TX	203A, 242A, 275A, 293A
Lorena, TX	----

<b><u>PROPOSED</u></b>	
<b><u>CITY</u></b>	<b><u>CHANNEL</u></b>
Llano, TX	203A, 242A, 271A, 275A
Lorena, TX	294A

The petitioner asserts that, upon allotment of Channel 294A to Lorena, an application for construction permit to move KEXX(FM) to that community will be filed promptly. The petitioner further affirms its intention to file for Channel 271A at Llano upon its allotment and the opening of a filing window.

**Lawrence L. Morton, P.E.**  
**Consulting Engineer to Elgin FM Limited Partnership**  
**January 24, 2001**



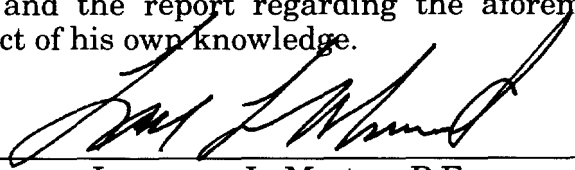
## AFFIDAVIT

State of California                    )  
  ) ss:  
County of Los Angeles                )

Lawrence L. Morton, being first duly sworn upon oath, deposes and says:

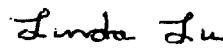
- That he is a qualified engineer,
- That he is a Registered Professional Engineer in the State of California,
- That he is a member of the Association of Federal Communications Consulting Engineers,
- That his qualifications are a matter of record with the Federal Communications Commission,
- That he has prepared many broadcast applications and engineering exhibits that have been filed with and granted by the Federal Communications Commission,
- That he has carried out such engineering work and that the results thereof are attached hereto and form part of this affidavit, and
- That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge.

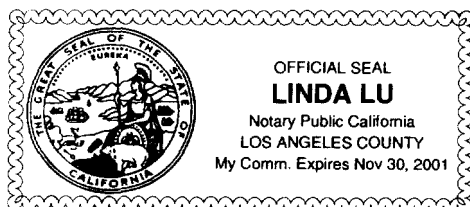
Date: January 25, 2000

  
\_\_\_\_\_  
Lawrence L. Morton, P.E.

On January 25, 2000, before me, Linda Lu, a Notary Public, in and for the State of California, personally appeared Lawrence L. Morton known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

My Commission expires 11/30/2001

  
\_\_\_\_\_  
Notary Public



Lambert Azimuthal Equal-Area

30' 00" Graticule Spacing

CENTER OF MAP:

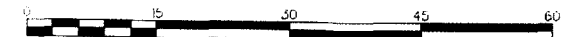
EXHIBIT E-2

N LAT 31° 04' 55.00"  
W LON 97° 58' 05.00"

KEXX(FM) AUTHORIZED AND PROPOSED  
60 dBu F(50,50) SERVICE CONTOURS  
PROPOSED GAIN AREA

Scale 1 : 857,973

KILOMETERS



STATUTE MILES



LAWRENCE L. MORTON ASSOCIATES  
Telecommunications Engineers  
Hollywood Hills, California

GOLDTHWAITE

HAMILTON

CRANFILLS GAP

CLIFTON

WEST

MOUNT CALM

ROSS LEROY

GHOLSON

VALLEY MILLS

LACY-LAKEVIEW

BURG MART

CRAW

OGLESE

GATESVILLE

FORT GATES

EVANT

RICHLAND SPRINGS

SAN SABA

LOMETA

60 dBu CONTOUR FROM LORENA PROPOSED FACILITY

MORGAN'S POINT RESORT

Fort Hood  
COPPERAS COVE KILLEEN

HARKER HEIGHTS BELTON

TEMPLE

ROSEBUD

LAMPASAS

LITTLE RIVER-ACADEMY

Salado

ROGERS

HOLLAND

BUCKHOLTS

CAMERON

FLORENCE

BARTLETT

GRANGER

MILANO

Serenada

WEIR

GEORGETOWN

ROCKDALE

THORNDALE

THRALL

TAYLOR

LEANDER

HUTTO

ROUND ROCK

JONESTOWN

BRIARCLIFF

LAKEWAY

MANOR

ELGIN

LEXINGTON

Buchanan Dam

Kingland

GRANITE SHOALS

MARBLE FALLS

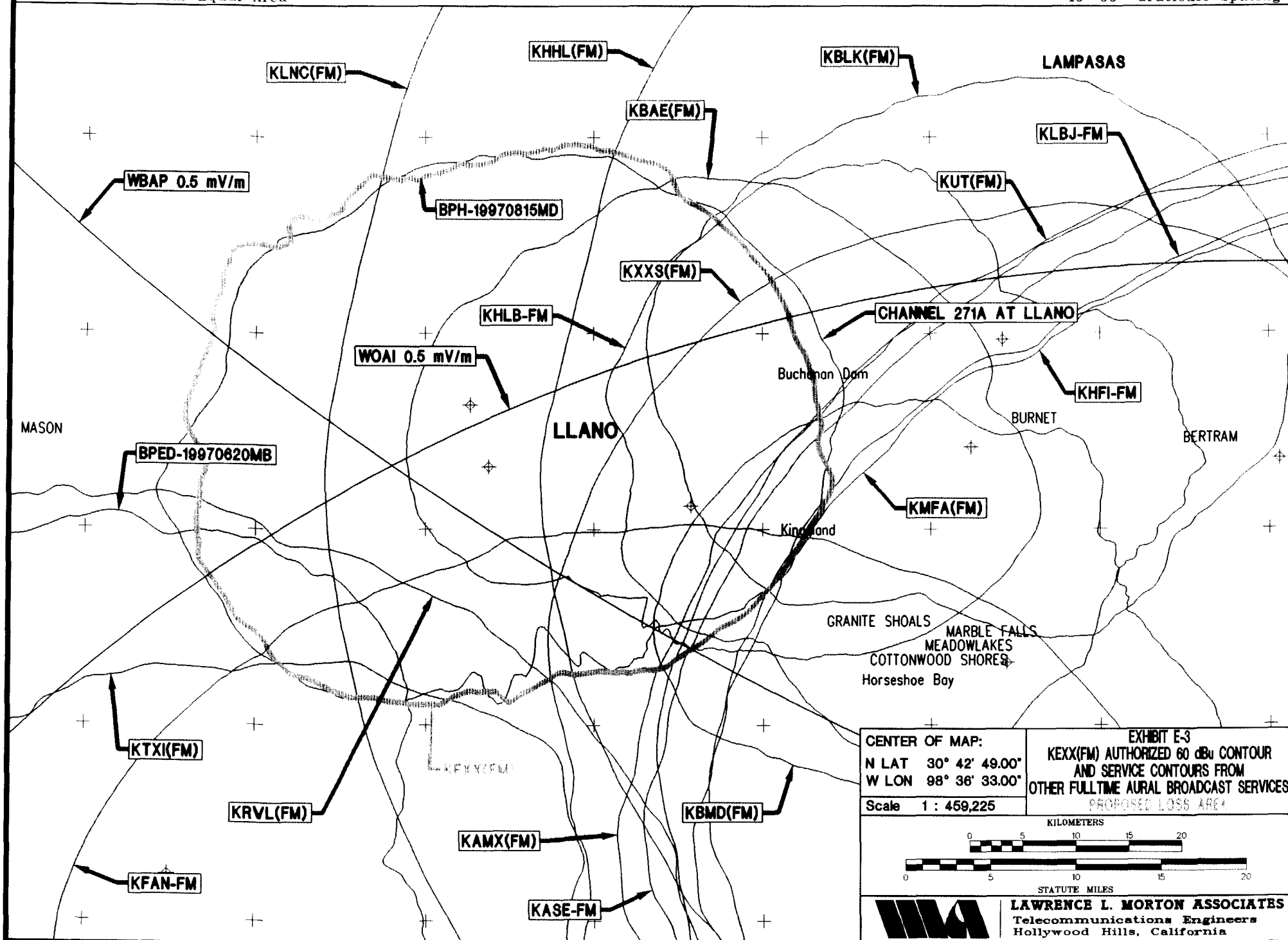
Horseshoe Bay

BURNET

BERTRAM

Proposed Loss Area

LLANO

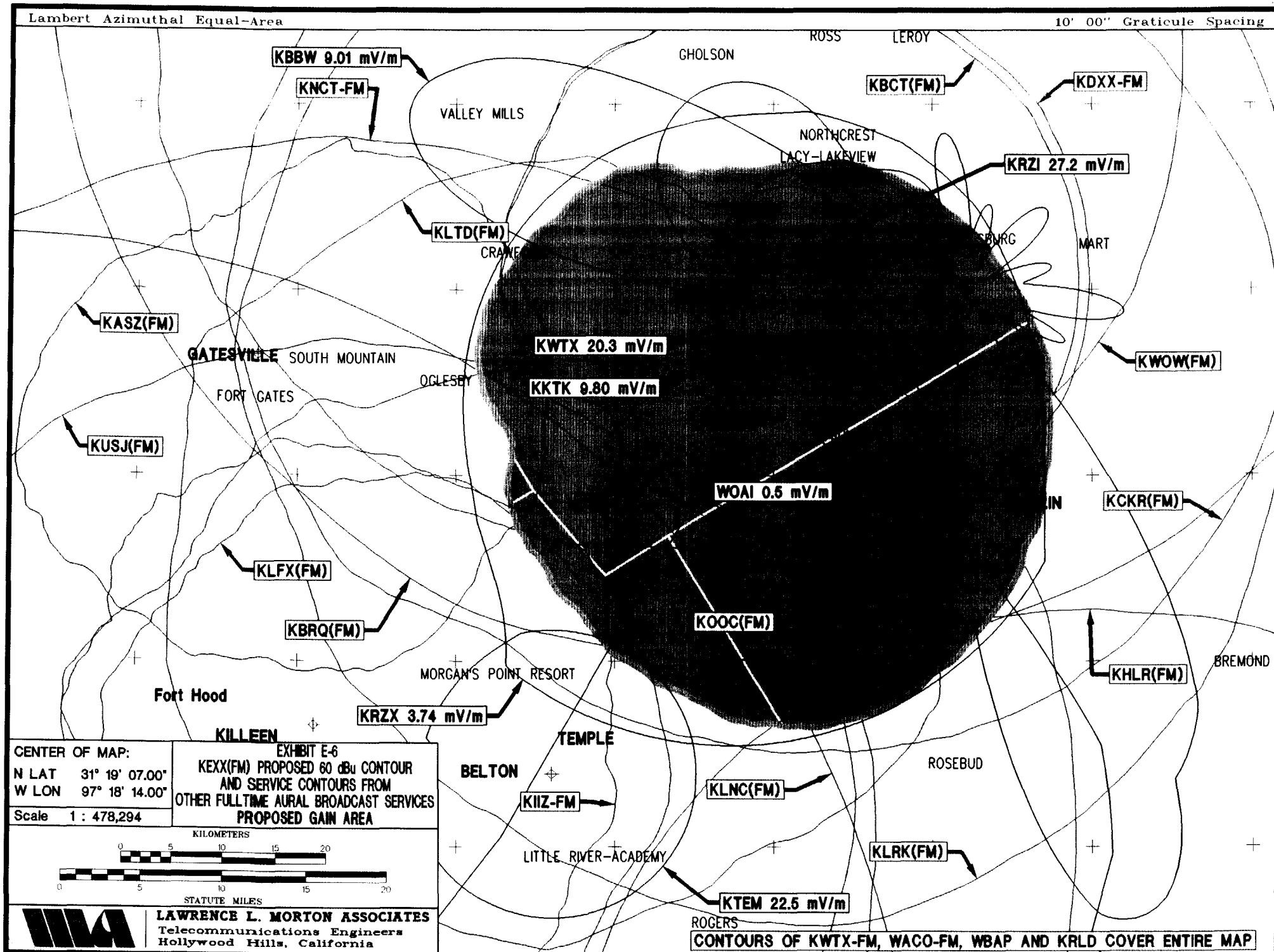


**EXHIBIT E-4**  
**OTHER AURAL SERVICES WITHIN KEXX(FM)**  
**PROPOSED LOSS AREA AT LLANO**  
**Elgin FM Limited Partnership**  
**January 2001**

NUMBER OF STATIONS SERVING THIS AREA	LAND AREA			POPULATION	
	SQUARE KILOMETERS	SQUARE MILES	% OF LOSS AREA	2000 CENSUS POPULATION	% OF LOSS AREA
0	0.03	0.01	0.00	0	0.00
1	0.12	0.05	0.00	0	0.00
2	16.57	6.40	0.66	0	0.00
3	175.78	67.87	7.03	94	1.34
4	214.09	82.66	8.56	106	1.51
5	463.77	179.06	18.55	489	6.96
6	387.02	149.43	15.48	271	3.86
7	405.25	156.47	16.21	374	5.32
8	188.60	72.82	7.54	3388	48.21
9	155.46	60.02	6.22	118	1.68
10	119.24	46.04	4.77	28	0.40
11	198.02	76.46	7.92	787	11.20
12	50.73	19.59	2.03	45	0.64
13	15.18	5.86	0.61	37	0.53
14	34.96	13.50	1.40	273	3.89
15	52.45	20.25	2.10	624	8.88
16	21.28	8.22	0.85	386	5.49
17	1.61	0.62	0.06	7	0.10
18	0.00	0.00	0.00	0	0.00
19	0.48	0.18	0.02	0	0.00
20	0.00	0.00	0.00	0	0.00
21	0.00	0.00	0.00	0	0.00
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
<b>TOTALS:</b>	<b>2500.64</b>	<b>965.50</b>	<b>100.0 %</b>	<b>7027</b>	<b>100.0 %</b>

**EXHIBIT E-5**  
**STATIONS PROVIDING**  
**OTHER FULLTIME AURAL BROADCAST SERVICES**  
**WITHIN KEXX(FM) PROPOSED LOSS AREA**  
**Elgin FM Limited Partnership**  
**January 2001**

LINE	CALL LETTERS	CITY	STATE	FREQUENCY
1	19970620MB	DOSS	TX	88.1 MHz
2	KBMD	MARBLE FALLS	TX	88.5
3	KMFA	AUSTIN	TX	89.5
4	KTXI	INGRAM	TX	90.1
5	KUT	AUSTIN	TX	90.5
6	KBLK	BURNET	TX	92.5
7	KLNC	CEDAR PARK	TX	93.3
8	KLBJ-FM	AUSTIN	TX	93.7
9	KRVL	KERRVILLE	TX	94.3
10	KAMX	LULING	TX	94.7
11	KBAE	LLANO	TX	96.3
12	KHFI-FM	GEORGETOWN	TX	96.7
13	KHHL	LEANDER	TX	98.9
14	KASE-FM	AUSTIN	TX	100.7
15	271A	LLANO	TX	102.1
16	19970815MD	LLANO	TX	102.9
17	KXXS	MARBLE FALLS	TX	104.9
18	KHLB-FM	BURNET	TX	106.9
19	KFAN-FM	JOHNSON CITY	TX	107.9
20	WBAP	FORT WORTH	TX	820. kHz
21	WOAI	SAN ANTONIO	TX	1200



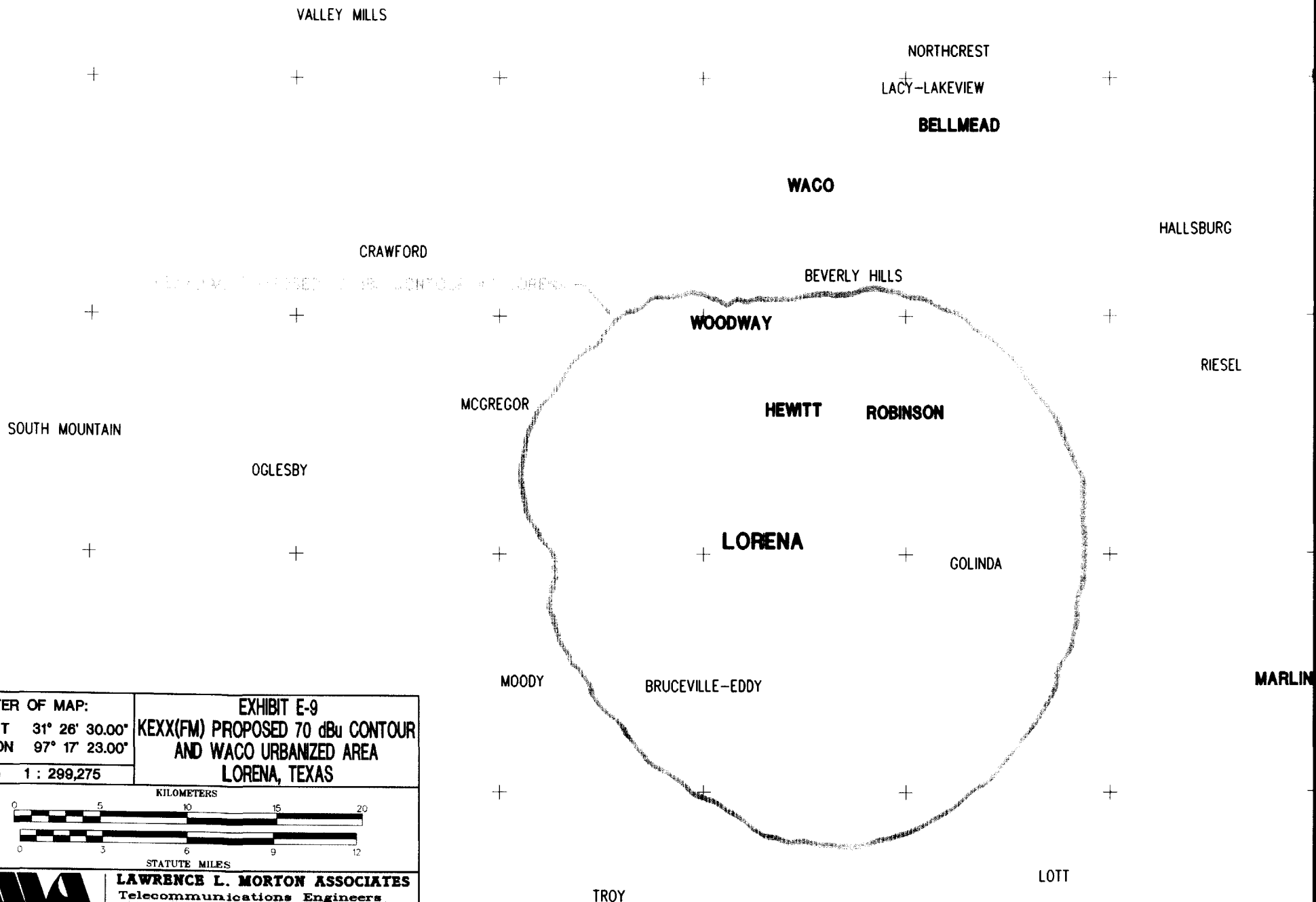


**EXHIBIT E-7**  
**OTHER AURAL SERVICES WITHIN KEXX(FM)**  
**PROPOSED GAIN AREA AT LORENA**  
**Elgin FM Limited Partnership**  
**January 2001**

NUMBER OF STATIONS SERVING THIS AREA	LAND AREA			POPULATION	
	SQUARE KILOMETERS	SQUARE MILES	% OF GAIN AREA	1990 CENSUS POPULATION	% OF GAIN AREA
0	0.00	0.00	0.00	0	0.00
1	0.00	0.00	0.00	0	0.00
2	0.00	0.00	0.00	0	0.00
3	0.00	0.00	0.00	0	0.00
4	0.00	0.00	0.00	0	0.00
5	0.00	0.00	0.00	0	0.00
6	0.00	0.00	0.00	0	0.00
7	0.00	0.00	0.00	0	0.00
8	2.81	1.08	0.11	0	0.00
9	39.29	15.17	1.56	5037	2.96
10	72.66	28.06	2.88	186	0.11
11	231.30	89.31	9.17	1697	1.00
12	211.51	81.67	8.38	2123	1.25
13	754.64	291.37	29.90	16892	9.93
14	805.36	310.95	31.91	21353	12.55
15	309.94	119.67	12.28	60441	35.52
16	93.24	36.00	3.69	58245	34.23
17	2.88	1.11	0.11	4189	2.46
18	0.00	0.00	0.00	0	0.00
19	0.00	0.00	0.00	0	0.00
20	0.00	0.00	0.00	0	0.00
21	0.00	0.00	0.00	0	0.00
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
<b>TOTALS:</b>	<b>2523.62</b>	<b>974.38</b>	<b>100.0 %</b>	<b>170163</b>	<b>100.0 %</b>

**EXHIBIT E-8**  
**STATIONS PROVIDING**  
**OTHER FULLTIME AURAL BROADCAST SERVICES**  
**WITHIN KEXX(FM) PROPOSED GAIN AREA**  
**Elgin FM Limited Partnership**  
**January 2001**

<b>NAME</b>	<b>CALL LETTERS</b>	<b>CITY</b>	<b>STATE</b>	<b>FREQUENCY</b>
1	KNCT-FM	KILLEEN	TX	91.3
2	KIIZ-FM	KILLEEN	TX	92.3
3	KLRK	MARLIN	TX	92.9
4	KLNC	CEDAR PARK	TX	93.3
5	KBCT	WACO	TX	94.5
6	KCKR	WACO	TX	95.7
7	KWTX-FM	WACO	TX	97.5
8	KASZ	GATESVILLE	TX	98.3
9	WACO-FM	WACO	TX	99.9
10	KLTD	TEMPLE	TX	101.7
11	KBRQ	HILLSBORO	TX	102.5
12	KHLR	CAMERON	TX	103.9
13	KWOW	CLIFTON	TX	104.1
14	KUSJ	HARKER HEIGHTS	TX	105.5
15	KOOC	BELTON	TX	106.3
16	KLFX	NOLANVILLE	TX	107.3
17	KDXX-FM	CORSICANA	TX	107.9
18	WBAP	FORT WORTH	TX	820
19	KBBW	WACO-MARLIN	TX	1010
20	KRLD	DALLAS	TX	1080
21	WOAI	SAN ANTONIO	TX	1200
22	KWTX	WACO	TX	1230
23	KTEM	TEMPLE	TX	1400
24	KKTK	WACO	TX	1460
25	KRZI	WACO	TX	1580
26	KRZX	WACO	TX	1660



CENTER OF MAP:

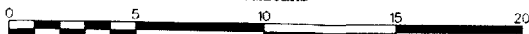
N LAT 31° 28' 30.00"  
W LON 97° 17' 23.00"

Scale 1 : 299,275

EXHIBIT E-9

KEXX(FM) PROPOSED 70 dBu CONTOUR  
AND WACO URBANIZED AREA  
LORENA, TEXAS

KILOMETERS



STATUTE MILES

LAWRENCE L. MORTON ASSOCIATES  
Telecommunications Engineers  
Hollywood Hills, California

70 dBu F(50,50) CONTOUR FROM ALLOTMENT REFERENCE SITE

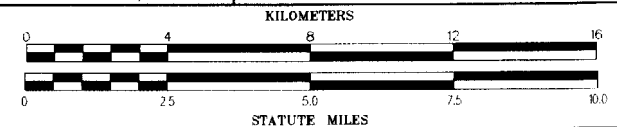
Bushman Dam

Kingsford

CENTER OF MAP:

N LAT 30° 42' 56.00"  
W LON 98° 43' 10.00"

Scale 1 : 212,970

EXHIBIT E-10  
70 dBu CITY GRADE CONTOUR  
FROM CHANNEL 271 ALLOTMENT  
REFERENCE SITE AT LLANOLAWRENCE L. MORTON ASSOCIATES  
Telecommunications Engineers  
Hollywood Hills, California

Lambert Azimuthal Equal-Area

2' 30" Graticule Spacing

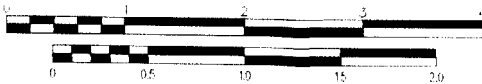
CENTER OF MAP:

N LAT 30° 44' 01.00"  
W LON 98° 43' 24.00"

Scale 1 : 63,275

**EXHIBIT E-11**  
**CHANNEL 271A PERMISSIBLE**  
**AREA TO LOCATE AT LLANO, TEXAS**

KILOMETERS



STATUTE MILES



**LAWRENCE L. MORTON ASSOCIATES**  
Telecommunications Engineers  
Hollywood Hills, California

